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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT**JUDGE KNESS**  
**MAGISTRATE JUDGE MCSHAIN****CAT. 3**  
**RANDOM**

## IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JAMES REED, AS ASSIGNEE OF  
 7942 COUNTRY CLUB INC AND AS  
 TRUSTEE OF 7942 COUNTRY CLUB  
 IRRV TRUST, AND INDIVIDUALLY

Petitioner

v.

CIRCUIT COURT OF COOK COUNTY,  
 ILLINOIS, HON. TIMOTHY C. EVANS,  
 CHIEF JUDGE IN HIS CAPACITY AS  
 AS SENIOR ADMINISTRATOR OF THE  
 COURT; OFFICE OF THE TREASURER  
 OF COOK COUNTY, HON. MARIA  
 PAPPAS, AS SUPERVISOR OF THE TAX  
 COLLECTOR OF COOK COUNTY, IL,

Respondents

In Re: Circuit Court of Cook County, Illinois  
 Case Numbers: 17CH08139 cons. w/  
                   13CH28231 and  
                   17COTD003838

Orders Entered in Violation of Auto-  
 matic Stay pursuant to 11 USC 362(a)  
 and 11 USC 541 and Stay Imposed by  
 Petition to Remove Pursuant to 28 USC  
 1452 docketed as DEBK 17-12768 and  
 managed as DEBK 17-12560, and case  
 NDIL BK 17ap588, respectively

**1:23-CV-01287**

Docket No.: 2023-cv-\_\_\_\_\_

Hon. \_\_\_\_\_  
U.S. Magistrate JudgeHon. \_\_\_\_\_  
U.S. District Judge**PETITION FOR DETERMINATION****OF JURISDICTION AND MOTION****FOR SANCTIONS AND COSTS**


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**NOW COMES THE PETITIONER**, James Reed (“Petitioner”), pursuant to 28 USC §

1331, 11 USC 362(a), 11 USC 541, 28 USC 1452, and US Const. Amend. 14 and seeks an Order of this Court in Determination of the subject matter jurisdiction of the Courts of the State of Illinois in a parcel of real property located in Cook County, Illinois in which named Defendants in a Quiet Title action filed simultaneous Chapter 11 Petitions for Reorganization pursuant to the United States' Bankruptcy Act in the U.S. Bankruptcy Court for the District of Delaware on December 4, 2017, where the Bankruptcy Court has, to date, retained jurisdiction post-confirmation, and where no order of remand has been granted and the Circuit Court of Cook County, Illinois, has not sought permission to proceed with the State litigation, and no party with an alleged interest in the real property has sought permission of the Bankruptcy Court to proceed, save for the Petitioner herein who timely filed a claim against the Bankruptcy Estate, as more fully pleaded herein.

Specifically, Petitioner seeks an Order determining that:

1. the subject matter jurisdiction of the Circuit Court of Cook County, Illinois was vitiated on December 4, 2017 when Woodbridge Mortgage Investment Fund 1 LLC, the originator and holder of a mortgage liened against a parcel of real property located within Cook County, Illinois filed a Chapter 11 Petition for Reorganization (17bk12768 DEB managed as case 17-12560) with the U.S. Bankruptcy Court for the District of Delaware during the pendency of a Quiet Title action (17CH08139) in which Woodbridge was a named Defendant together with its related servicing agent entity, Silverleaf Funding LLC, which filed a simultaneous Petition.
2. the subject matter jurisdiction of the Circuit Court of Cook County, Illinois was vitiated on December 4, 2017 in case 13CH28231, a case consolidated with case 17CH08139 on July 28, 2017 by Order of the Circuit Court of Cook County, Illinois. Silverleaf Funding LLC is the original Plaintiff in 13CH28231, and is also a named Defendant in 17CH08139. Further, Silverleaf filed a Chapter 11 Petition simultaneously with its related entity, Woodbridge, on

December 4, 2017, as case 17-12837 (DEB).

3. the subject matter jurisdiction of the Circuit Court of Cook County, Illinois was vitiated on December 7, 2017 in case 17CH08139 consolidated with case 13CH28231 when Petitioner herein filed a Notice of Petition and Petition to Remove with the Clerk of the U.S. District Court for the Northern District of Illinois, case 17-ap-00588, pursuant to 28 USC 1452 and 11 USC 362(a), for removal of 17CH08139 consolidated with case 13CH28231 and transfer to the U.S. Bankruptcy Court for the District of Delaware, cases collectively managed as case 17-12560 In Re: The Woodbridge Group of Companies.
4. the subject matter jurisdiction of the Circuit Court of Cook County, Illinois was vitiated in case 17COTD003838, a Petition for Tax Deed case, in which neither Petitioner herein, nor Woodbridge, nor Silverleaf were named as Respondents, nor served Notice of the Redemption Period, as required by Due Process as extended to the States by the 14<sup>th</sup> Amendment to the U.S. Constitution, and as required by Article IX, Section 8 of the Constitution of the State of Illinois, because the Circuit Court of Cook County, Illinois, despite being administratively managed through a number of divisions and departments, has but a singular existence under the Constitution of the State of Illinois and regardless of which division or department in which litigation may be filed, in this case there is but only one subject property, and a prohibition of exercise of jurisdiction over one division or department of Circuit Court of Cook County, Illinois with regard to a specific parcel of real property is a prohibition against against the exercise of jurisdiction by all divisions and/or departments of the Circuit Court of Cook County, Illinois, and, in fact, against All courts of the State of Illinois.
5. the Circuit Court of Cook County, Illinois failed to adhere to federal law and continued to issue orders that, if valid, would have affected the ownership of the property of the Estate in

Bankruptcy, without the prior explicit permission of the federal courts, and did thereby deny Petitioner his Constitutionally guaranteed Due Process rights to notice prior to the deprivation or attempted deprivation of his property rights in violation of the 5<sup>th</sup>, 7<sup>th</sup>, and 8<sup>th</sup> Amendments of the Constitution through the 14<sup>th</sup> Amendment of the Constitution, and in violation of Article IX, Section 8 of the Constitution of the State of Illinois.

6. the Treasurer of Cook County, Illinois, pursued actions designed to affect the ownership of the subject property through the sale of alleged unpaid general real estate taxes without extending to Petitioner his Constitutionally guaranteed Due Process rights to notice prior to the deprivation or attempted deprivation of his property rights in violation of the 5<sup>th</sup>, 7<sup>th</sup>, and 8<sup>th</sup> Amendments of the Constitution through the 14<sup>th</sup> Amendment of the Constitution, and in violation of Article IX, Section 8 of the Constitution of the State of Illinois.

### **Summary and Prayer for Relief**

The acts of the Circuit Court of Cook County, Illinois, and the Treasurer of Cook County, Illinois, have been taken in violation of Petitioner's rights as guaranteed by the U.S. Constitution as denoted above.

### **Petitioner prays this Court enter:**

1. an Order of Vacatur of all Orders entered by the Circuit Court of Cook County, Illinois, regardless of the captioned case or proceeding, which were entered on or after December 4, 2017, germane to the subject property; and,
2. an Order compelling the Treasurer of Cook County, Illinois, and the Circuit Court of Cook County, Illinois, to certify subject to penalty of perjury and fine, that the complete records data base of Cook County, Illinois, including the registrar of voters, the active and closed case files of the Circuit Court, the records of the Cook County Recorder of Deeds, and the

State data base of U.C.C. liens be checked and an assessment of actual ownership of a parcel of real property located in Cook County, Illinois be determined prior to the entry of any Order of the Circuit Court of Cook County, Illinois, the enforcement of which could affect the ownership rights in and to said parcel of real property; and,

3. an Order of Reimbursement to Petitioner for all costs related to Petitioner's filing of any and all legal proceedings and reasonable attorneys fees related to the subject property since December 4, 2017.
4. an Order for such other relief as to which Petitioner may be entitled in the interests of justice.

**Respectfully Submitted, this 1<sup>st</sup> day of March, 2023,**

**James Reed,  
Petitioner Pro Se**

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